

Docket No.: 24-CV-01688-NRM-CLP

**INITIAL CONFERENCE QUESTIONNAIRE**

1. Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure, if not yet made: **June 10, 2024**
2. If additional interrogatories beyond the 25 permitted under the federal rules are needed, the maximum number of: plaintiff(s) **None beyond 25**; and defendant(s) **None beyond 25**.
3. Number of depositions by plaintiff(s) of: **6-10** parties non-parties
4. Number of depositions by defendant(s) of: **5** parties non-parties
5. Date for completion of \*pre-certification discovery: **October 28, 2024**
6. Number of expert witnesses of plaintiff(s): **none** medical non-medical  
Date for expert report(s):
7. Number of expert witnesses of defendant(s): **none** medical non-medical  
Date for expert report(s):
8. Date for completion of expert discovery: **To be determined after the Court rules on Certification.**
9. Time for amendment of the pleadings by plaintiff(s)  
or by defendant(s): **September 23, 2024**
10. Number of proposed additional parties to be joined by plaintiff(s) **None** and by  
defendant(s) **None**, and time for completion of joinder: **September 23, 2024**
11. Types of contemplated dispositive motions: plaintiff(s): **Class Certification, SJM**  
defendant(s): **None**
12. Dates for filing contemplated dispositive motions: plaintiff(s): **Class Certification: November 28, 2024**  
defendant(s): **SJM: at the close of merits discovery.**
13. Have counsel reached any agreements regarding electronic discovery? If so, please describe at the initial conference. **In accordance with applicable federal rules.**
14. Have counsel reached any agreements regarding disclosure of experts' work papers (including drafts) and communications with experts? If so, please describe at the initial conference.
15. Will the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (Answer no if any party declines to consent without indicating which party has declined.) \*

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\* The fillable consent form may be found at

[http://www.nyed.uscourts.gov/General\\_Information/Court\\_Forms/court\\_forms.html](http://www.nyed.uscourts.gov/General_Information/Court_Forms/court_forms.html) and may be filed electronically upon completion prior to the initial conference, or, brought to the initial conference and presented to the Court for processing.